August 31, 2006

Minerals Management Service
MS 5412
1201 Elmwood Park Blvd.
New Orleans, LA 70123

RE: COMMENTS ON EIS SCOPING FOR THE LIOWP PROJECT
PROJECT ID # PLN-HQ-0001

In response to the MMS Notice of Intent to prepare an Environmental Impact Statement (EIS), pursuant to Title 40 NEPA, the Town of Babylon wishes to participate in the review process. We have reviewed the draft scope prepared by the service for completeness. Overall the scope covers many of the topics of concern to the Town and its residents. However, we request the Service consider the following for inclusion in the final scope.

Alternatives

The draft scope states the EIS will discuss the LIOWP and the No Action Plan as alternatives. We feel the scope is limited in this respect and request the Service evaluate additional alternatives in the EIS.

Scale

The Service needs to consider a project of reduced size, preferably a Pilot project taking a more gradual approach to the concept of offshore wind generation farms. A project of smaller scale could be located at a terrestrial site or an alternative offshore location (i.e. Plum Island).

Location

The location of the LIOWP will impact the coastline along the south shore, which happens to be a precious resource for the region. The ocean beaches that will be impacted by the LIOWP – including historic Jones Beach – are visited by millions of people a year. These coastal resources are critical to Long Island's economy and quality of life. To mitigate issues relating to the negative impact the LIOWP may have on scenic views and aesthetics, alternative locations involving a terrestrial wind farm located on the mainland and a deep water sited wind farm (beyond 10 miles) need to be evaluated.

Renewable Technologies

Renewable energy technologies produce electrical power that is generally more expensive

than electrical power generated by conventional fossil fuel combustion. However, they also possess certain favorable environmental attributes, including:

- Low or no air emissions or wastewater discharges when compared to traditional fossil fuel electrical power generation (excepting certain biomass technologies);
- Avoidance of environmental impacts related to drilling, mining or other extraction methods associated with fossil fuel production; and
- Utilization of sustainable resources or waste streams that would otherwise require disposal.

The following renewable technologies should be evaluated as alternatives to this proposal:

- Photovoltaic/solar
- Tidal
- Wave

Transmission Cable Location:

The proposed method for laying the transmission cable from the barrier island to the LIPA substation is by towed hydraulic jet plow. It is stated this technique would create a narrow trench, approximately 36 inches wide, "suspending a relatively small amount of sediment within the water column near the sea floor, the majority of which is expected to settle over in installed cables and cable trenches".

This technique has the potential to impact fish, wildlife and their habitats including, but not limited to, burial or degradation of shoals, loss of shoreline and wetland vegetation, siltation, resuspension of sediments, increased turbidity, disruption of fish movements, and impacts to benthic habitat. During the installation of submarine cables, suspended sediment could bury important habitat and degrade habitat quality. Suspended sediment also lowers the levels of dissolved oxygen and may deter fish movements or inhibit foraging. Indirect impacts may include fragmentation of contiguous habitat and degradation of spawning areas.

To mitigate these stated impacts, we request the Service evaluate land based cable routes using existing cross bay bridges or other structures to reach the substation.

Coastal Erosion Hazard Area

Pursuant to NYS ECL Article 34, all of Babylon's ocean shoreline has been mapped as a Coastal Erosion Hazard Area. The State defines a Coastal Erosion Hazard Area as a coastline where the average annual recession rate is at least one foot. Dunes, beaches and near shore areas are natural protective features where the alteration of which may reduce or destroy the protection afforded other lands against erosion.

The planned path the transmission cable will cross the barrier island is immediately east of the Community of West Gilgo Beach. This section of beach has traditionally been hardest hit by accelerated erosion rates. In compliance with State Article 34 regulations, the EIS needs to evaluate the potential impact the horizontal directional drilling process will have on these natural protective features and subsoil structures.

We appreciate this opportunity to comment and look forward to participating in the EIS process.

Sincerely,

Steven Bellone
Supervisor, Town of Babylon

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